

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

In the Matter of: )  
Lawrence Technological University ) FINAL DETERMINATION  
Southfield, Michigan )  
Respondent. )

## **FINAL DETERMINATION**

Pursuant to the Final Policy Statement, Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations, 65 Fed. Reg. 19618 (Apr. 11, 2000) (Self-Disclosure Policy), the U.S. Environmental Protection Agency, Region 5, issues this Final Determination regarding violations disclosed by Lawrence Technological University (LTU). The violations that are the subject of this Final Determination were voluntarily disclosed to EPA by LTU in an initial Disclosure Report dated May 25, 2010. LTU advised EPA that it had corrected the violations in a Final Compliance Report dated March 29, 2011. In response to EPA requests, LTU provided additional information on December 15, 2011 and February 28, 2012. The audit and corrective actions were undertaken pursuant to the Audit Policy Agreement by and between the Michigan Colleges Foundation, Participating Institutions and the United States Environmental Protection Agency, Region 5, dated November 5, 2008 (Audit Agreement).

## **I. SELF-DISCLOSURE POLICY**

To encourage regulated entities to conduct voluntary compliance evaluations and to voluntarily discover, disclose and correct violations of environmental requirements, EPA promulgated the Self-Disclosure Policy. As an incentive for regulated entities to participate in the Self-Disclosure Policy's voluntary disclosure process, EPA may eliminate or substantially reduce the gravity-based component of civil penalties to be assessed for violations that are voluntarily disclosed in accordance with the conditions specified in the Self-Disclosure Policy. The conditions of the Self-Disclosure Policy are: 1) discovery of the violation(s) through an environmental audit or compliance management system; 2) voluntary discovery; 3) prompt disclosure; 4) discovery and disclosure independent of government or third-party plaintiff; 5) correction and remediation; 6) prevention of recurrence; 7) no repeat violations; 8) violations not excluded from Self-Disclosure Policy; and, 9) cooperation.

Under the Self-Disclosure Policy, EPA may reduce gravity-based penalties up to 100 percent if the disclosing entity satisfies all of the conditions described above. EPA may reduce gravity-based penalties up to 75 percent if the disclosing entity satisfies conditions 2-9, above. However, EPA reserves the right to assess a civil penalty with regard to any economic benefit that may have been realized as a result of such violations, even in those instances when the disclosing entity has

met all the conditions of the Self-Disclosure Policy. In its enforcement discretion, EPA may waive a civil penalty with regard to the economic benefit arising from such violations if EPA determines that such economic benefit is insignificant. Penalty reductions are not available under the Self-Disclosure Policy for violations that result in serious actual harm or may present an imminent and substantial endangerment to public health or the environment, nor are such reductions available for violations of any order or consent agreement.

## **II. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. In the Disclosure Report dated May 25, 2010, LTU disclosed violations of one or more of the following: the Clean Air Act (CAA); Clean Water Act (CWA); Safe Drinking Water Act (SDWA); Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); Emergency Planning and Community Right-to-Know Act (EPCRA) and Toxic Substances Control Act (TSCA). A complete list of the disclosed violations is attached to this Final Determination as Appendix A.
2. Based on the information provided by LTU, EPA has determined that LTU has met each of the following conditions set forth in the Self-Disclosure Policy, as explained below:
  - (A) It discovered the violations through an environmental audit.
  - (B) It identified the violations voluntarily, not through a monitoring, sampling or auditing procedure required by statute, regulation, permit, judicial order, administrative order, consent decree or consent agreement.
  - (C) It promptly disclosed the violations to EPA in writing within 21 days of their discovery.
  - (D) It identified and disclosed the violations prior to the commencement of a federal, state, or local agency inspection, investigation, or information request, notice of citizen suit, legal complaint by a third party, report by a "whistleblower" employee or imminent discovery by a regulatory agency.
  - (E) It has corrected the disclosed violations.
  - (F) It has taken steps to prevent recurrences of the violations.
  - (G) It has disclosed violations, none of which are repeat violations from prior self-disclosures or enforcement actions within the past three years.
  - (H) It has disclosed violations, none of which either (i) resulted in serious actual harm, or posed an imminent and substantial endangerment to human health or the environment, or

- (ii) violated the specific terms of any judicial or administrative order or consent agreement.
- (I) It has cooperated with EPA and provided the information necessary for the Agency to determine the applicability of the Self-Disclosure Policy to its disclosures.

### **III. DETERMINATION**

Pursuant to the Self-Disclosure Policy, and based on information provided by LTU, EPA makes the following determinations.

1. LTU has violated various environmental statutes and regulations as set forth in Appendix A.
2. The authority to seek civil penalties for the violations contained in Appendix A is found at one or more of the following: Section 113 of the CAA, 42 U.S.C. § 7413; Sections 309(g) and 311(b)(6) of the CWA, 33 U.S.C. §§ 1319(g) and 1321(b)(6); Section 325 of EPCRA, 42 U.S.C. § 11045; Section 109(b) of CERCLA, 42 U.S.C. § 9609(b); Sections 3008(a) and (g) of RCRA, 42 U.S.C. § 6928(a) and (g); Section 14(a) of FIFRA, 7 U.S.C. § 136l(a); and Section 16 of TSCA, 15 U.S.C. § 2615.
3. EPA has calculated the gravity-based penalty for the disclosed violations in accordance with one or more of the following: CAA Stationary Source Civil Penalty Policy (October 1991), the RCRA Civil Penalty Policy (June 2003), the Civil Penalty Policy for Section 311(b)(3) and Section 311(j) of the Clean Water Act (August 1998), the Enforcement Response Policy for Sections 304, 311 and 312 of the Emergency Planning and Community Right-to-Know Act and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (September 30, 1999), the FIFRA Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act (December 2009), the Interim Clean Water Act Settlement Penalty Policy (March 1, 1995), and the Section 1018 – Disclosure Rule Enforcement Response and Penalty Policy (December 2007). Based upon the information disclosed to EPA, EPA has calculated a total gravity-based civil penalty for the disclosed violations of \$331,488.
4. Based on the information provided by LTU and EPA's consideration of the Audit Agreement and Self-Disclosure Policy, EPA has determined that the participating institution has met all of the conditions of the Self-Disclosure Policy. LTU qualifies for, and receives for the disclosed violations, a 100 percent reduction in the gravity-based component of the civil penalty. LTU has not obtained a significant economic benefit from the tardy correction of the disclosed violations. EPA will not seek to recover from LTU the economic benefit, if any, obtained by tardy compliance.

#### **IV. RESERVATION OF RIGHTS**

1. This Final Determination resolves only the potential claims for civil penalties that might arise out of the violations referenced here and more specifically described in the Disclosure Report (May 25, 2010) and Final Compliance Report (March 29, 2011) from LTU. Nothing in this Final Determination is intended, nor may be construed, to operate in any way to resolve criminal liability, if any, of LTU. EPA reserves the right to require compliance, corrective action, and/or other remedial measures in connection with any violations, including those alleged here, of any federal environmental law.
2. This Final Determination does not relieve LTU of its obligation to comply with all applicable provisions of federal, state, and local law, nor may it be construed to be a ruling on, or determination of, any issues relating to any federal, state, or local permit. This Final Determination does not constitute a waiver, suspension, or modification of the requirements of environmental law or any regulations promulgated thereunder.
3. EPA reserves the right to undertake any action against any person, including LTU, in response to any condition that EPA determines may present an imminent and substantial endangerment to the public health, welfare or the environment.
4. EPA reserves the right to revoke this Final Determination and render it null and void if and to the extent that any information or certification LTU provided, upon which EPA based its grant of any civil penalty mitigation, was materially false or inaccurate at the time such information or certification was provided to EPA. In such event, EPA reserves the right to assess and collect any civil penalties for any violation described therein. Such revocation must be in writing and will become effective upon receipt by LTU.

In issuing this Final Determination, EPA seeks to promote self-auditing by LTU and expects LTU to be in full compliance with regulatory requirements and to continue the internal procedures necessary to prevent recurrences of violations of environmental requirements.

Under the Authority of the  
U.S. Environmental Protection Agency, Region 5

By:



Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 5

Date: June 15, 2012

**APPENDIX A**  
**FINAL SCHEDULE A WITH CORRECTIVE ACTIONS**

**HRP Associates, Inc.**

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation Name and Room (i.e., CAA, ICRA, CWA,..)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Discharge of Violation Federal Citation / State Citation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
CAA - NESHAP	Campus-Wide	No asbestos disposal records (Notice of Intent) on file for asbestos abatement project for Engineering Building, Maintenance Office, and Science Building (heating system)	Greater than three (3) years	N/A	40 CFR 61.150(d) MAC, 1995 346.1842 (Rule 942)	Contact asbestos abatement contractor to see if they have said records. Maintain records for all asbestos disposal activities here forward to prove disposal in certified landfill. Documentation should include: (i) The name, address, and telephone number of the waste generator; (ii) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program; (iii) The approximate quantity at cubic meters (cubic yards); (iv) The number and telephone number of the disposal site operator; (v) The name and physical site location of the disposal site; (vi) The date in the Engineering Building, Maintenance Office, and Science Building heating system. The files have been released and will be kept on-site in the Director of Facilities Office (Ann Arbor).	June 29, 2010	In the future, if any asbestos statement projects occur, the Director of Facilities will ensure that all asbestos documentation is kept on-site in the centralized records of his office.	\$50
CAA - NESHAP	Pole Barn	Potential asbestos containing waste materials (i.e. floor tiles and mastic) are not being stored in accordance with the packaging and labeling requirements of the NESHAP Asbestos standard.	Greater than three (3) years	100-150 used and damaged floor tiles with mastic	40 CFR 61.150(a) & (b) MAC, 1995 346.1842 (Rule 942)	Lawrence Tech must properly seal all ACM in leak-tight wrappings or leak-tight containers, that is labeled with the OSHA hazard warning and a properly completed US DOT shipping label. This material must be disposed of in a timely manner in a Type II landfill and the waste disposal manifest must be maintained for a period of at least five years.	July 3, 2010	Lawrence Tech contracted, EQ Industries Services (EPA #MDP070956), to properly seal all ACM in air-tight containers and asbestos containing floor tiles will be properly tested by an asbestos inspector and if necessary, abated and disposed of by a licensed asbestos abatement firm.	\$150
CWA	Applied Research Center Environmental Chamber	Wastewater from the environmental chamber is being discharged outside to the storm drain and may have a pH >10 units and contain high levels of salt.	Greater than three (3) years	Approximately 300 gallons per semester	40 CFR 122 R. 323.2106	Cease the discharge of all wastewater to the storm drain. The University must choose to obtain an NPDES permit to include this wastewater discharge re-zone the wastewater to its sanitary sewer in compliance with the local sewer ordinances discharge the wastewater could be discharged to the sanitary sewer. The wastewater for off-site disposal as regulated limits; or collect the wastewater for off-site disposal as regulated waste.	June 29, 2010	Lawrence Tech personnel from the Civil Engineering Department will monitor the pH of the wastewater prior to discharging down the drain to ensure that the wastewater is in compliance with the pH limit of the local POTW. Personnel will test the pH of the wastewater before and after any necessary pH adjustment. If any changes to this wastewater discharge occur, the wastewater will be reviewed prior to discharging to the sanitary sewer to ensure it is still able to meet the local city ordinances.	\$75

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Location - Building Name and Room (e.g., CAA, RCRA, CWA...)	Issue or Concern: Nutrient Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Discharged Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
4 CWA	Architecture Building Room 121	Failure to test or obtain approval from the POTW to discharge untreated fixer waste to sink drains and the sanitary sewer.	Greater than three (3) years	Approximately five (5) gallons per semester	R. 323.23(3) 40 CFR 403.5(a)	Cease discharge of all waste fixer and/or other photography wastewater down the drain until contact has been made with the POTW to determine what chemicals can be discharged to the sanitary sewer under the local sewer ordinances. Consider installation of a filter recovery unit. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination and perform pollutant monitoring in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles and sample results. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month; because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	June 29, 2010	A memo to the Architecture Department to cease the practice of discharging fixer to the sink wastewater prior to discharge. Additionally, Lawrence Tech personnel from the Architecture Department will monitor what chemicals are discharged down the drain to ensure that only the chemicals approved by the local POTW are discharged and that the acceptable quantities are not exceeded.	\$25
5 CWA	Campus-Wide	Failure to test the floor stripper wastewater prior to discharge to sewage treatment plant with the local sewer use ordinance.	Greater than three (3) years	Approximately 250 gallons per year	R. 323.23(3) 40 CFR 403.5	Cease discharge of all chemicals and/or wastewaters down the drain until contact has been made with the POTW to determine what chemicals can be discharged in the sanitary sewer under the local sewer ordinances. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination on the chemicals in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month; because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	June 10, 2010	Lawrence Tech will monitor what chemicals are discharged down the drain to ensure that only the chemicals approved by the local POTW are discharged and that the acceptable quantities are not exceeded.	\$25
6 CWA	Center for Innovative Materials Research Environmental Chamber	Wastewater from the brine tank in the environmental chamber is being discharged down to the drain to the sanitary sewer and may have a pH >10 units.	Greater than three (3) years	Approximately 1,000 gallons per semester	R. 323.23(3) 40 CFR 403.5(a)	Cease discharge of all chemicals down the drain until contact has been made with the POTW to determine what chemicals can be discharged to the sanitary sewer under the local sewer ordinances. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination on the chemicals in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month; because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	September 1, 2010	Lawrence Tech personnel from the Center for Innovative Materials Research will monitor the pH of the wastewater prior to discharge down the drain to ensure that the wastewater is in compliance with the pH limits of the local POTW. Personnel will log the pH of the wastewater before and after any necessary pH adjustment. If any changes to this wastewater discharging occur, the wastewater will be reviewed prior to discharge to the sanitary sewer to ensure it is still able to meet the local city ordinances.	\$25

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (I.e., CAA, RCRA, CWA, ...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Discharge Violation <sup>1</sup>	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
7 CWA	Engineering Building 1st Fico-Mechanical Room	Failure to test air compressor condensate for oil and grease (at a minimum) prior to discharge to a floor drain to ensure compliance with the local sewer ordinances.	Greater than three (3) years	< 1 gallon per semester	40 CFR 403.5(a) R. 323.2303	Cease discharge of all chemicals down the drain until contact has been made with the POTW to determine what chemicals can be discharged to the sanitary sewer under the local sewer ordinances. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination on the chemicals in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	June 29, 2010	Lawrence Tech personnel from the facilities department will monitor what chemicals are discharged down the drain to ensure that only the chemicals approved by the local POTW are discharged and that the unacceptable qualities are not exceeded. The University will collect air compressor condensate in a labeled and closed container for off-site disposal.	\$183
8 CWA	Science Building Room 325	Failure to test or obtain approval from the POTW to discharge acetone from cleaning glassware to sink drains.	Greater than three (3) years	Less than one (1) L per year	40 CFR 403.5(e) R. 323.2303	Cause discharge of all chemicals down the drain until contact has been made with the POTW to determine what chemicals can be discharged to the sanitary sewer under the local sewer ordinances. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination on the chemicals in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	June 29, 2010	Lawrence Tech personnel from the facilities department will monitor what chemicals are discharged down the drain to ensure that only the chemicals approved by the local POTW are discharged and that the unacceptable qualities are not exceeded. The University will collect air compressor condensate in a labeled and closed container for off-site disposal.	\$25
9 CWA	Science Power House	Failure to test air compressor condensate for oil and grease (at a minimum) prior to discharge to a floor drain to ensure compliance with the local sewer ordinances.	Greater than three (3) years	< 1 gallon per semester	40 CFR 403.5(a) R. 323.2303	Cause discharge of all chemicals down the drain until contact has been made with the POTW to determine what chemicals can be discharged to the sanitary sewer under the local sewer ordinances. Retain documentation from the POTW, where possible. Note, it may be necessary to complete a waste stream determination on the chemicals in order for the POTW to make an interpretation of whether or not the chemicals causes interference. Keep copies of all waste determination profiles. In addition, develop protocols to identify if and when fifteen (15) kilograms (approx. four (4) gallons) or more of a chemical is disposed down the drain within one (1) month because disposal of more than fifteen (15) kilograms in any one (1) month triggers reporting requirements.	June 29, 2010	Lawrence Tech personnel from the facilities department will monitor what chemicals are discharged down the drain to ensure that only the chemicals approved by the local POTW are discharged and that the unacceptable qualities are not exceeded. The University will collect air compressor condensate in a labeled and closed container for off-site disposal.	\$183

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MT)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Specific Regulatory Citation for Disputed Violation			
					Federal Citation	State Citation		
10 CWA - SPCC	Art and Design Center Room 103	Approximately one (1)-80 gallon elevator hydraulic oil reservoir has the potential to discharge oil to a floor drain located in the vicinity of the reservoir yet no secondary containment is provided	Approximately three (3) years	One (1)-80 gallon AST	N/A - No equivalent state regulation	40 CFR 112.7	General secondary containment may be provided through the use of (i) dikes, berms or retaining walls sufficiently impervious to contain oil; (ii) curbing, (iii) culverts, gutters, or other drainage systems; (iv) weirs, booms, or other barriers; (v) spill diversion ponds; (vi) retention ponds; or (vii) providing sorbent materials, filled operational equipment; a facility has the option to establish new provide a secondary containment for the elevator reservoir.	\$35
11 CWA - SPCC	Campus-Wide	Failure to train oil handling employees in operation and maintenance of equipment to prevent discharges, discharge procedure protocols, applicable pollution control laws, rules, and regulations, general facility operations, and the contents of the campus-wide SPCP plan.	Greater than three (3) years	N/A	40 CFR 112.7(f)	N/A - No equivalent state regulation	Train oil handling personnel annually in the contents of campus-wide ICP. Training should include provisions for petroleum spill recovery, equipment available to prevent discharges, discharge procedure protocols, applicable pollution control laws, rules, and regulations, and general facility operations.	\$1,250
12 CWA - SPCC	Campus-Wide	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to develop and implement a Spill Prevention, Control and Countermeasures (SPCC) Plan that includes all oil storage on-site.	Greater than three (3) years	N/A	40 CFR 112.3	N/A - No equivalent state regulation	Update the existing campus-wide ICP to include provisions for petroleum spill recovery for all oil storage on-site in containers with a capacity of 55 gallons or more. Specifically the ICP should be updated to include the: Applied Research Center-(1) 55 gallon drum CT 101; Applied Research Center-(4) 55 gallon drums EB5; Applied Research Center-(1) 55 gallon drums waste oil; Applied Research Center-(2) 55 gallon drums used oil; Maintenance Department-(4) 55 gallon drums diesel/motor oil; Pole Barn-(1) 55 gallon drum gasoline; and A. Alfred Tschuman Student Service Center-(1) 250 gallon grease/dumper.	\$4,250
13 CWA - SPCC	Campus-Wide	The campus maintains greater than 1,320 gallons of oil on campus in minimum 55 gallon capacity containers in a manner which could affect navigable waterways yet has failed to conduct and document the inspection of oil storage on-site.	Greater than three (3) years	N/A	40 CFR 112.7(e)	N/A - No equivalent state regulation	Complete the first inspection as an element of this corrective action, and continue on a regular schedule as specified in the ICP Record each inspection and maintain it on-site for at least three (3) years.	Sec item # 11
							The first inspection was completed on October 12, 2010 as part of the SPCC training that HRP Associates, Inc. conducted.	As part of the inspection protocol, will conduct inspections on a regular schedule as specified in the plan. Each inspection log will be maintained on-site for at least three (3) years.

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation Federal Citation/ State Citation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
14 CWA - SPCC	Wayne H. Buell Management Building Outside Loading Dock Area	The 250 gallon bulk container of waste greases is not provided with secondary containment and is in an area which may affect navigable waterways via stormwater drains < 5 feet away on campus.	Greater than three (3) years	One (1)-250 gallon AST	N/A - No equivalent state regulation	Provide secondary containment for the entire capacity of the tank plus sufficient freeboard (typical 110%). Containment areas should be sufficiently impervious to contain a leak or a spill. Examples of commonly used secondary containment mechanisms include dikes, containment curbing, and pits. If the containment area could potentially collect rainwater, the SPCC plan must include provisions for ensuring rainwater is not contaminated prior to draining and draining dry's maintained.		In the future when the building renovation is completed, a new double walled AST for kitchen grease will be installed in accordance with the recommendations in the ICP.	\$85
15 EPCRA	Campus Wide	Road salt, OSHA Hazardous Substances, are stored on campus in excess of the 10,000 lb TPC but were not included on an annual Tier II report.	Greater than three (3) years	> 10,000 pounds of road salt	40 CFR 370.20 40 CFR 370.40 40 CFR 370.42 40 CFR 370.43 40 CFR 370.44 40 CFR 370.45	N/A - No equivalent state regulation	Submit a Tier II report for diesel fuel, MAG Total Ice and Dust Control and road salt to the SERC, LEPC and local fire department. Since the campus has historically not filed this report, the first substantial should include reports for the last five (5) reporting years.	On October 28, 2010, the Director of Facilities installed a plug in the drain next to the grease dumpster.	October 28, 2010
16 EPCRA	Campus Wide	Road salt, OSHA hazardous substances, above their threshold quantity yet has failed to submit the corresponding MSDS to the SERC, LEPC and local fire department.	Greater than three (3) years	N/A	40 CFR 370.20 40 CFR 370.30 40 CFR 370.31 40 CFR 370.32 40 CFR 370.33	N/A - No equivalent state regulation	Submit a copy of the MSDS for diesel fuel, MAG Total Ice and Dust Control and road salt to the SERC, LEPC and local fire department.	The Director of Campus Safety is responsible for compilation of the annual Tier II report and MSDS reporting. Chemical inventories will be updated annually and compared against Appendix A and the EHS threshold planning quantities. Any additional hazardous chemicals stored in quantities exceeding 10,000 pounds in the future will be submitted to the SERC, LEPC and local fire department.	October 1, 2010
17 RCRA - Hazardous Waste	Applied Research Center Brin Laboratory	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to camp's status	Greater than three (3) years	One (1) spray can	40 CFR 299.92(c)(1) R 261.56(c)(1) 40 CFR 261.56(f)(1) 299.92(b)(2)(e) 40 CFR 262.11		All aerosol cans will be collected as part of a student recycling program and no longer are disposed of in the trash. Aerosol cans will be collected and brought to one central location in the Pale Barn so the cans can be punctured using a newly purchased aerosol can puncturer and the cans recycled as scrap metal.	The collection containers for the social activist cans throughout campus. The Director of Facilities will be responsible for communicating the new protocol to the campus for the proper disposal of aerosol cans.	\$900

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Corrective Action Proposed		Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Discharged Violation	Federal Citation	State Citation	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
			Corrective Action Taken	Corrective Action Proposed								
RCRCA *	Applied Research Center	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	Conduct waste determinations on all filters and then properly dispose of the chemical wastes as hazardous wastes if necessary.	Lawrence Tech contracted with EG, Industries Services, Inc. to perform a waste stream determination on the filters. A sample was taken on October 8, 2010 and based on the results it was determined to be a non-hazardous waste.	Greater than three (3) years	Approximately four (4) to five (5) liters per year	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R 299.93(2)(1) 40 CFR 262.11			October 15, 2010	A campus wide procedure has been implemented to collect all waste and property dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through waste knowledge or analytical testing, prior to disposal. This departmental faculty, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	\$388
RCRCA *	Applied Research Center	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	All aerosol cans will be collected as part of student recycling program and no longer disposed of in the trash. Aerosol cans will be collected and brought to one central location in the Pole Barn so the cans can be punctured using a newly purchased aerosol can puncturer and the cans recycled as scrap metal.	Used aerosol spray cans must either be disposed of as hazardous waste or punctured so that pressure in the cans reach atmospheric pressure before disposing of as general refuse. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	Greater than three (3) years	One (1) spray can	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R 299.93(2)(1) 299.93(2)(2)(e)			June 30, 2010	The University has provided collection containers for the spent aerosol cans throughout campus. The Director of Facilities will be responsible for communicating the new protocol to the campus for the proper disposal of aerosol cans.	See #17
RCRCA *	Applied Research Center	Vehicular Dynamics Laboratory	All aerosol cans will be collected as part of student recycling program and no longer disposed of in the trash. Aerosol cans will be collected and brought to one central location in the Pole Barn so the cans can be punctured using a newly purchased aerosol can puncturer and the cans recycled as scrap metal.	Used aerosol spray cans must either be disposed of as hazardous waste or punctured so that pressure in the cans reach atmospheric pressure before disposing of as general refuse. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	Greater than three (3) years	N/A	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R 299.93(2)(1) 299.93(2)(2)(e)			June 30, 2010	The University has provided collection containers for the spent aerosol cans throughout campus. The Director of Facilities will be responsible for communicating the new protocol to the campus for the proper disposal of aerosol cans.	See #17
RCRCA *	Contractual Services	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	All aerosol cans will be collected as part of student recycling program and no longer disposed of in the trash. Aerosol cans will be collected and brought to one central location in the Pole Barn so the cans can be punctured using a newly purchased aerosol can puncturer and the cans recycled as scrap metal.	Used aerosol spray cans must either be disposed of as hazardous waste or punctured so that pressure in the cans reach atmospheric pressure before disposing of as general refuse. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	Greater than three (3) years	N/A	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R 299.93(2)(1) 299.93(2)(2)(e)			June 30, 2010	The University has provided collection containers for the spent aerosol cans throughout campus. The Director of Facilities will be responsible for communicating the new protocol to the campus for the proper disposal of aerosol cans.	See #17
RCRCA *	Engineering Building	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty status	All aerosol spray cans must either be disposed of as hazardous waste or punctured so that pressure in the cans reach atmospheric pressure before disposing of as general refuse. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	Used aerosol spray cans must either be disposed of as hazardous waste or punctured so that pressure in the cans reach atmospheric pressure before disposing of as general refuse. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus can be punctured using a newly purchased aerosol can puncturer and the cans recycled as scrap metal.	Greater than three (3) years	Two (2) aerosol cans	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R 299.93(2)(1) 299.93(2)(2)(e)			June 30, 2010	The University has provided collection containers for the spent aerosol cans throughout campus. The Director of Facilities will be responsible for communicating the new protocol to the campus for the proper disposal of aerosol cans.	See #17
RCRCA *	Hazardous Waste	Engineering Loading Dock										

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (M)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Discharge Violation Federal Citation / State Citation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
22 RCRA - Hazardous Waste	Field House Room R6	Used rugs have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	Ten (10) to fifteen (15) oily rags	40 CFR 261.5(f)(1) R. 299.9302(1) 261.5(e)(1) 40 CFR 262.11	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the rugs. A sample was taken on October 8, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	October 15, 2010	See #18
23 RCRA - Hazardous Waste	Maintenance Building Automotive Shop	Aerosol spray cans (a potentially hazardous waste) are disposed of as general refuse without regard to empty stains	Greater than three (3) years	Four (4) to six (6) aerosol cans per week	40 CFR 261.5(f)(1) R. 299.9302(1) 261.5(g)(1) 299.9205(2)(a) 40 CFR 262.11	Used aerosol spray cans must either be disposed of as hazardous wastes or punctured so that pressure in the cans is released. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the oil filters. A sample was taken on October 8, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	June 30, 2010	See #17
24 RCRA - Hazardous Waste	Maintenance Building Automotive Shop	Oil filters disposed as general trash	Greater than three (3) years	Six (6) oil filters per week	40 CFR 261.5(f)(1) R. 299.9302(1) 261.5(g)(1) 40 CFR 262.11	Conduct a waste determination on all used oil filters and then properly dispose of the filters as hazardous waste as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the oil filters. A sample was taken on October 8, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	October 15, 2010	See #18
25 RCRA - Hazardous Waste	Maintenance Building Paint Shop			Approximately 76 aerosol cans per year	40 CFR 261.5(f)(1) R. 299.9302(1) 261.5(g)(1) 40 CFR 262.11	Used aerosol spray cans must either be disposed of as hazardous wastes or punctured so that pressure in the cans is released. The contents of punctured aerosol spray cans must be collected and properly disposed of as hazardous waste. The campus may also look into recycling options for this waste stream.	All aerosol cans will be collected as part of a student recycling program and no longer disposed of in the trash. Aerosol cans will be collected and brought to one central location in the Pote Barn so the cans can be punctured using a newly purchased aerosol can puncture and the cans recycled as scrap metal.	June 30, 2010	See #17

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Description/Citation for Discrepancy/Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - Hazardous Waste §261, Subpart A	Maintenance Building	Containers of waste paint do not meet the definition of "empty," prior to being disposed in the general trash.	Greater than three (3) years	(3-5) 1-gallon oil based paint containers	40 CFR 261.7 R 299.9207	Containers must be completely emptied prior to disposal within the general trash. Empty is defined as (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating; and (ii) No more than 2.5% of the volume or inner liner, or (iii) No more than 3 percent by weight of the container remains in the container or inner liner. Additionally, the campus must identify those empty containers which held acutely hazardous chemicals and either collect the containers for disposal as hazardous waste or triple rinse containers, collecting residue for waste determinations.	June 7, 2010	The Director of Campus Security has issued a memo to the campus staff on the proper procedures for disposal of waste oil based paint.	\$25
RCRA - Hazardous Waste §261, Subpart A	Maintenance Building Paint Shop								
RCRA - Hazardous Waste §262, Subpart A	A-Block House Laundry Room	Poor auditors identified obsolete chemicals (i.e. paint stripper, contact patch, aerosol can) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	One (1)-16 oz aerosol can of paint, eight (8) to twelve (12)- 1 gallon containers of paint stripper, and contact patch, 1 gallon containers each of acid-anhydride cleaner and poison ivy killer.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	1. Identify these chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to a separate central accumulation area for disposal, ensure all applicable rules/permits are followed through a licensed contractor, EQ Industries Services, Inc. for its storage prior to disposal are met (i.e. labeled, dated, closed, etc.)	September 1, 2010	Lawrence Tech confirmed that the identified chemicals were waste. A waste determination was conducted based on vendor knowledge on obsolete chemicals and they were determined to be hazardous. The central accumulation area for disposal, ensured all applicable rules/permits were followed through a licensed contractor, EQ Industries Services, Inc.	\$3,460
RCRA - Hazardous Waste §262, Subpart A	Applied Research Center Aerodynamics Laboratory	Waste fuel used in the aerodynamics laboratory have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	Two (2)-1 gallon containers of "Champion Fuel"	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	Conduct a waste determination on all chemicalized waste streams and then properly dispose of the chemicalized waste as hazardous waste or liquid industrial waste (if nonhazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 29, 2010	See #418	A campus wide procedure has been implemented to collect all waste and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The Michigan Liquid Waste Industrial Code is followed.
RCRA - Hazardous Waste §262, Subpart A									

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Response Unit (ie: CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation State Citation				
29	RCRA - Hazardous Waste §62, Subpart A	Applied Research Center Flammable Cabinet	Pear auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	One (1) -32 gallon trash can of Epoxy resin containers, old paint cans, and 16 oz gasol spray cans  Approximately two (2) years	40 CFR 261.5(q)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	1. Identify these chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to their respective determined to be hazardous. The central accumulation area for disposal, ensure all applicable rules/standards for disposal prior to disposal are met (i.e. labeled, dated, closed, etc.)	June 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #WMD569526) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
30	PCRA - Hazardous Waste §62, Subpart A	Applied Research Center Mini Baja Laboratory	Used oily rags used to work on baja vehicles in the laboratory have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	40 CFR 261.5(q)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 15, 2010	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the paint booth filters. A sample was taken on October 8, 2010 and based on the results it was determined to be a non-hazardous waste.	See #18
31	RCRA - Hazardous Waste §62, Subpart A	Applied Research Center New Paint Booth	Used paint filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	40 CFR 261.5(q)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	Conduct waste determinations on all filters and then properly dispose of the chemical wastes as hazardous wastes if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 15, 2010	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the paint booth filters. A sample was taken on October 8, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	See #18

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Location - Regulation (U.C., CAA, RCRA, CWA...)	Issue or Concern Noted in Environmental Compliance Audit	Current/Action Proposed	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
Building Name and Room	Quantity	Duration of Violation <sup>1</sup>	Specific Regulatory Citation for Disclosed Violation			
			Federal Citation State Citation	State Citation		
RCRA - Waste #262, Subpart A 32	Used non-absorbent steel have not been properly classified as hazardous or non-hazardous prior to clear disposal.	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	40 CFR 261.5(q)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R-299-9302 (1)	Lawrence Tech contracted with EQ, Industries Services, Inc. to perform a waste stream identification on the rugs. A sample was taken on October 8, 2010 and found on October 15, 2010 determined to be a non-hazardous waste.	See #18
RCRA - Hazardous Waste #262, Subpart A 33	Poor auditors identified obsolete photo development chemicals (i.e. fixer, developer) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the central accumulation area for disposal, ensure all applicable rules/permits are met (i.e. labeled, dated, closed, etc.)	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R-299-9302 (1)	Lawrence Tech confirmed that the identified chemicals were wastes. A waste determination was conducted based on user knowledge on obsolete chemicals and legacy chemicals to determine if they were determined to be hazardous. The waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	September 1, 2010 See #27
RCRA - Hazardous Waste #262, Subpart A 34	Engineering Building 1st Floor- Mechanical Room	Poor auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	One (1) 16 oz gallon can of "Saf- sol"	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the central accumulation area for disposal, ensure all applicable rules/permits are met (i.e. labeled, dated, closed, etc.)	June 30, 2010 See #27

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation 6-5-CAA RCRA, CWA, etc.	Location - Building Name and Room 6-5-CAA RCRA, CWA, etc.	Issue or Concern Noted in Environmental Compliance Audit	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
				Federal Citation State Citation				
35	RCRA - Hazardous Waste \$262, Subpart A	Engineering Building 1st Floor-Mechanical Room  Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Once (1) small box of lubricant 40 CFR 261.5(f)(1) R 299.9302 (1) 261.5(g)(1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemical to a secure determined to be hazardous. The central accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#0956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
36	RCRA - Hazardous Waste \$262, Subpart A'	Engineering Building High Bay-Electrical Room  Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	One (1) 1 gallon container 40 CFR 261.5(f)(1) R 299.9302 (1) 261.5(g)(1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemical to a secure determined to be hazardous. The central accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#0956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
37	RCRA - Hazardous Waste \$262, Subpart A'	Engineering Metal Fabrication Laboratory  Dust and debris (metal, stainless steel, plexiglass) from sandblasting have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	Approximately 10-15 gallons per year used sandblast media 40 CFR 261.5(f)(1) R 299.9302 (1) 261.5(g)(1) 40 CFR 262.11	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the sand blasting grit. A sample was taken on October 8, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	October 15, 2010	A campus wide procedure has been implemented to collect all wastes and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The department, facility, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	See #18

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g. CAA, RCRA, CWA...)	Location - Building Name and Room (e.g. CAA, RCRA, CWA...)	Issue or Concern Note in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disputed Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - Hazardous Waste §62, Subpart A	Engineering Building Room E19	Poor audits identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Two (2) gas cylinders	40 CFR 261.5(f)(1) R 299.93(2) (1)	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not reusable, conduct a waste stream determination, move the chemicals to a interim accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the wastes will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#090256) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	\$27
RCRA - Hazardous Waste §62, Subpart A	Engineering Building Room E2 - Geo and Material Laboratory	Poor audits identified obsolete chemicals (including substances) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are non-hazardous wastes.	Greater than three (3) years	One (1)-5 gallon unlabeled container	40 CFR 261.5(f)(1) R 299.93(2) (1)	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not reusable, conduct a waste stream determination, move the chemicals to a interim accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the wastes will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#090256) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	\$27
RCRA - Hazardous Waste §62, Subpart A	Engineering Building Room E3	Used filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	Approximately 1-2 filters per week	40 CFR 261.5(f)(1) R 299.93(2) (1)	Conduct a waste determinations on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 15, 2010	Lawrence Tech contacted with EQ Industries Services, Inc. to perform a waste stream determination on the filters. A sample was taken on October 15, 2010 and based on analytical laboratory results it was determined to be a non-hazardous waste.	\$18
RCRA - Hazardous Waste §62, Subpart A	Engineering Building Room E3				40 CFR 261.5(f)(1) R 299.93(2) (1)			A campus wide procedure has been implemented to collect all waste and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The department faculty, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disputed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation / State Citation				
41 RCRA - Hazardous Waste §462, Subpart A	Engineering Building Wood Shop - Room E3	Used filters have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	One (1) carbon and one (1) mesh filter per solvent	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R. 299.93(2) (1) 40 CFR 262.11	Conduct a waste determinations on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech contracted with EQ, Industries Services, Inc. to perform a waste stream determination on the filters. A sample was taken on October 8, 2010 and based on analyzed laboratory results it was determined to be a non-hazardous waste.	October 15, 2010	\$18 See #18
42 RCRA - Hazardous Waste §462, Subpart A	Engineering Building Wood Shop - Room E3	Waste solvents used in the wood shop area have not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	One (1) quart of used solvent in paint can per year	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R. 299.93(2) (1) 40 CFR 262.11	Conduct a waste determinations on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes or liquid industrial waste (if non-hazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Used solvent is no longer disposed in the trash. It is now collected in a closed and labeled container and will be disposed of as a hazardous waste per user knowledge. New I-cart of used solvent is properly managed.	June 30, 2010	\$25 See #25
43 RCRA - Hazardous Waste §462, Subpart A	Field House Room 16	Floor audits identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	One (1) pint of lubricant	40 CFR 261.5(e)(1) 40 CFR 261.5(e)(1) R. 299.93(2) (1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the clerical reuse program. 3. If there is no clerical reuse program, or if the chemicals are not usable, knowledge on obsolete chemicals and they conduct a waste stream determination, move the chemicals to a hazardous waste determination area for disposal, ensure all applicable rules are met (i.e. labeled, dated, closed, etc.)	September 1, 2010 See #27	\$10 See #27	

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation 6.c. CAA, RCRA, CWA...)	Location - Building Name and Room Issues or Concerns Noted in Environmental Compliance Audit	Quantity	Duration of Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
				Specific Regulatory Citation for Dislosed Violation			
				Federal Citation	State Citation		
RCAA - Hazardous Waste §262, Subpart A 44	Maintenance Building Autonotive Shop			40 CFR 261.5(f)(1) R. 299.9302 (1)	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes or liquid industrial waste (if non-hazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech contracted with EQ Industries Services, Inc. to perform a waste stream determination on the rags. A sample was taken on October 8, 2010 and based on the analytical laboratory results it was determined to be a non-hazardous waste.	October 15, 2010
RCAA - Hazardous Waste §262, Subpart A 45	Maintenance Building Autonotive Shop			40 CFR 261.5(f)(1) R. 299.9302 (1)	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes or liquid industrial waste (if non-hazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech's waste disposal company, EQ Industries Services, Inc., is managing this material as a recoverable petroleum product and directing it for recycling or fuel blending, depending on the OQ specification. EQ is applying the OQ2L Michigan Liquid Waste Industrial Code to this product.	October 29, 2010
RCAA - Hazardous Waste §262, Subpart A 46	Maintenance Building Autonotive Shop			40 CFR 261.5(f)(1) R. 299.9302 (1)	Conduct a waste determiniations on all chemical waste streams and then properly dispose of the chemical wastes as hazardous wastes if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	Lawrence Tech's waste disposal company, EQ Industries Services, Inc., is managing this material as a recoverable petroleum product and directing it for recycling or fuel blending, depending on the OQ specification. EQ is applying the OQ2L Michigan Liquid Waste Industrial Code to this product.	October 29, 2010
						A campus wide procedure has been implemented to collect all waste and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The department faculty, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	See #18
						A campus wide procedure has been implemented to collect all waste and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The department faculty, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	See #18
						A campus wide procedure has been implemented to collect all waste and properly dispose of it. If a waste stream changes or a new one is generated, the Director of Campus Safety will make sure a waste stream determination is performed, either through user knowledge or analytical testing, prior to disposal. The department faculty, facilities and custodial staff, and students will be informed of the new procedures. Additionally, all Lawrence Tech personnel will receive a refresher notification on how to handle such wastes.	See #18

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (6-1, CAA, RCRA, CWA,...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
47	Maintenance Building Paint Shop	Used rags have not been properly classified as hazardous or non-hazardous prior to their disposal in the trash.	Greater than three (3) years	One (1)-55 gallon drum of used rags every 2 years	40 CFR 261.5(f)(1) 40 CFR 261.5(b)(1)	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 15, 2010	Lawrence Tech contracted with EQ, Industries Services, Inc. to perform a waste stream determination on the rags. A sample was taken on October 3, 2010 and bussed on October 15, 2010 to an analytical laboratory for analysis. It was determined to be a non-hazardous waste.	See #18
48	Maintenance Building Paint Shop	Waste oil-based paint has not been properly classified as hazardous or non-hazardous prior to their disposal in the trash.	Greater than three (3) years	Approximately three (3) to five (5)-1 gallon containers of oil-based paint per year	40 CFR 261.5(f)(1) 40 CFR 261.5(b)(1)	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste or liquid industrial waste (if nonhazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	June 30, 2010	The oil based paint waste is no longer disposed in the trash. It is now collected in a closed and labeled container and will be disposed of as a hazardous waste per user knowledge. New 5 gallons of oil based paint waste per year is properly managed.	\$25
49	Maintenance Building Paint Shop	Used paint thinner has not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	One (1)-5 gallon container of used thinner every 2 years	40 CFR 261.5(f)(1) 40 CFR 261.5(b)(1)	Conduct a waste determination on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste or liquid industrial waste (if nonhazardous) as applicable. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	June 30, 2010	The used thinner is now collected in a closed and labeled container and will be disposed of as a hazardous waste per user knowledge. New 5 gallons of used thinner every 2 years is properly managed.	\$25

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation Building Name (e.g. CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Quantity	Duration of Violation <sup>1</sup>	Specific Regulatory Citation for Disclosed Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation / State Citation				
RCR-A - Hazardous Waste #262, Subpart A,	Maintenance Building Wood Shop	Peer auditors identified obsolete aerosol cans of enamel, glue, and paint as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Approximately 5-10 obsolete cans	Greater than three (3) years	40 CFR 261.3(f)(1) 40 CFR 261.5(e)(1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other facility, then donate to the chemical reuse program. 3. If there is a determination no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the central accumulation area for disposal, ensure all applicable rules for its storage prior to disposal are met (i.e. labeled, dated, closed, etc.)	September 1, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID9809956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste #362, Subpart A	Pole Barn Exterior	Peer auditors identified obsolete gasoline as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	One (1)-55 gallon drum of gasoline*	Greater than three (3) years	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	1. Identify those chemicals that are disposed of us a recoverable petroleum product through a licensed contractor, EQ, on August 30, 2010.  The product was disposed of us a recoverable petroleum product through a licensed contractor, EQ, on August 30, 2010.	August 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID9809956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste #362, Subpart A	Pole Barn Exterior	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Two (2)-5 gallon containers of unlabeled contents	Greater than three (3) years	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other facility, then donate to the chemical reuse program. 3. If there is a determination no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the central accumulation area for disposal, ensure all applicable rules for its storage prior to disposal are met (i.e. labeled, dated, closed, etc.)	August 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID9809956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste #362, Subpart A	Pole Barn Exterior	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Two (2)-5 gallon containers of unlabeled contents	Greater than three (3) years	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	1. Identify those chemicals that are disposed of us a recoverable petroleum product through a licensed contractor, EQ, on August 30, 2010.	August 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID9809956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - Hazardous Waste §262, Subpart A	Pole Barn Interior	Peer auditors identified obsolete ethanol as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	One (1)-55 gallon drum, of ethanol	40 CFR 261.3(a)(1) R. 259-9302 (1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the hazardous wastes category based on user knowledge. The central accumulation area for disposal, ensure all applicable rules/standards for disposal are met (i.e., labeled, dated, closed, etc.)	August 30, 2010	In the event that such wastes are generated in the future, the wastes will be stored properly and a waste stream determination will be conducted prior to disposal. Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID949956) to properly dispose of the wastes. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste §262, Subpart A	Pole Barn Interior	Peer auditors identified obsolete chemicals (i.e., concrete crack filler, adhesives, roof cement, hypochlorite solvent, Zep, methanol, seal-o-solve solvent, etc.) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	25-30 1 and 5 gallon containers of adhesives, sealants, concrete crack filler, roof cement, hypochlorite solution, Zep, Dowfrost HD, polyethylene glycol, methanol, seal-o-solve solvent, oil oxidizers, nitric acid, disinfectant pesticides	40 CFR 261.3(a)(1) R. 259-9302 (1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the hazardous wastes category based on user knowledge. The central accumulation area for disposal, ensure all applicable rules/standards for disposal are met (i.e., labeled, dated, closed, etc.)	September 1, 2010	In the event that such wastes are generated in the future, the wastes will be stored properly and a waste stream determination will be conducted prior to disposal. Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID949956) to properly dispose of the wastes. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste §262, Subpart A	Science Building, Room 211 - Dark Room	Peer auditors identified obsolete chemicals of fixer, developer, stop bath, bleach solution, pump oil and glycerin, as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Approximately ten (10) to fifteen (15)-1 qt. jugs, one (1)-600 ml. jar, and two (2)-500 gram containers	40 CFR 261.3(a)(1) R. 259-9302 (1) 40 CFR 262.11	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, conduct a waste stream determination, move the chemicals to the hazardous wastes category based on user knowledge. The central accumulation area for disposal, ensure all applicable rules/standards for disposal are met (i.e., labeled, dated, closed, etc.)	June 30, 2010	In the event that such wastes are generated in the future, the wastes will be stored properly and a waste stream determination will be conducted prior to disposal. Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID949956) to properly dispose of the wastes. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA,...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation, <sup>1</sup>	Quantity	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Corrective Action Proposed			
RCRA - Hazardous Waste #462, Subpart A	Science Building Room 211 - Radiology Room	Peer auditors identified obsolete chemicals as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Four (4)-18 oz. containers	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, knowledge on obsolete chemicals and their disposal on chemicals to be determined to be hazardous. The central accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#8199250) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste #462, Subpart A	Science Building Room 305	Unknown waste (Yellow) in a glass beaker has not been properly classified as hazardous or non-hazardous prior to their disposal.	Greater than three (3) years	One (1)-1,000 ml. beaker	According to Lawrence Tech personnel, his unknown waste stream could not be located following the audit and therefore no waste determination could be conducted. Waste determination could be conducted for all waste streams generated in this lab in the future to determine proper waste disposal.	September 1, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#8199250) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
RCRA - Hazardous Waste #462, Subpart A	Science Building Room 315	Peer auditors identified obsolete chemicals in the chemical stock room (i.e. HCl, trichloro benzene, sodium, granular carbon, etc.) as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Four (4)-1 gallon containers, twelve (12) to fifteen (15) 1 quart, twenty-five (25) to thirty (30) small jars various sizes	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not usable, knowledge on obsolete chemicals and their disposal on chemicals to be determined to be hazardous. The central accumulation area for disposal, ensure all applicable rules/waste was disposed of through a licensed contractor, EQ Industries Services, Inc.	June 30, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (EPA #MID#8199250) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room (e.g., CAA, RCRA, CWA...)	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Directed Violation <sup>1</sup>	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation State Citation				
59	Science Building Room 319	Waste solvents in flume hood have not been properly classified as hazardous or non-hazardous prior to their disposal.	One (1) year	One (1)-2 gallon container	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)	September 1, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (GPA #MID980956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
60	Science Building Room 319	Unknown waste (blue liquid) in a glass beaker has not been properly classified as hazardous or non- hazardous prior to their disposal.	One (1) year	One (1)-1 gallon beaker	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)	September 1, 2010	In the event that such wastes are generated in the future, the waste will be stored properly and a waste stream determination will be conducted prior to disposal. If the waste is determined to be hazardous, Lawrence Tech will contact a licensed hazardous waste transporter, EQ Industries Services (GPA #MID980956) to properly dispose of the waste. Additionally, all Lawrence Tech personnel received a memo regarding the proper protocol for disposal of obsolete or legacy chemicals.	See #27
61	University Technology and Learning Center Media Services Subpart A	Peer auditors identified obsolete chemicals of excess, developer, and stop bath, as being "abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	Eight (8)-1 gallon containers	40 CFR 261.5(f)(1) 40 CFR 261.5(g)(1) 40 CFR 262.11	R 299.9302 (1)	October 31, 2010	1. Identify those chemicals that are obsolete, legacy, no longer in use or no longer usable. 2. If chemicals are still usable and if they are actively being used in other departments or by other faculty, then donate to the chemical reuse program. 3. If there is a determination was conducted based on user knowledge on obsolete chemicals and they conduct a waste stream determination, move the chemicals to the source determined to be hazardous. The central accumulation area for disposal, ensure all applicable regulations was disposed of through a licensed contractor, EQ Industries Services, Inc.  For its storage prior to disposal are met (i.e. labeled, dated, closed, etc.)	See #27

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MT)**

Environmental Regulation (e.g., CAA, RCRA, CWA, etc.)	Location/ Building Name and Room	Issue or Concern Noticed in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulation/Citation for Dishonest Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation /State Citation				
62 RCRA - Hazardous Waste §262, Subpart A	Wayne H. Buell Management Building	Poor audits identified obsolete chemicals as being abandoned" and thus considered solid waste. As such, the campus must conduct a waste stream determination of these abandoned chemicals to determine if they are hazardous wastes.	Greater than three (3) years	One (1)-55 gallon drum	40 CFR 261.5(c)(1) 40 CFR 261.5(a)(1) 40 CFR 262.11	Lawrence Tech identified the contents of this drum as antifreeze. This product was determined to be a stable product and is not subject to the chemical reuse program. 3. If there is no chemical reuse program or if the chemicals are not stable, conduct a waste stream determination, move the chemicals to a waste stream if no violation exists. central accumulation area for disposal, ensure all applicable rules for its storage prior to disposal are met (i.e. labeled, dated, closed, etc..)	September 10, 2010	Lawrence Tech will review all chemical storage locations on a regular basis to ensure that all containers are labeled with the proper contents.	\$25
63 RCRA - Hazardous Waste §262, Subpart A	Wayne H. Buell Management Building	Used rats have not been properly classified as hazardous or non-hazardous prior to their disposal	Greater than one (1) year	One (1) 40 gallon container	40 CFR 261.5(c)(1) 40 CFR 262.11	Conduct a waste determinations on all chemical waste streams and then properly dispose of the chemical wastes as hazardous waste if necessary. Document the completed waste stream determination and maintain such documentation for at least three (3) years from the date the waste was last generated.	October 15, 2010	The Director of Campus Safety is responsible for ensuring that the facilities and custodial personnel are trained and complying with the proper universal waste procedures. To ensure that universal waste (i.e. lamps and bulbs) are not stored on campuses for longer than one year, LTU will schedule at minimum an annual pickup for universal waste. The universal waste will be disposed of through a licensed contractor.	\$4,118
64 Universal Waste	A. Alfred Taubman Student Services Center	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Two (2) years	Fourteen (14) bulbs	40 CFR 273.14(e) R-299-9278 (f)(c) (iv)	Used lamps must be stored in containers that are labeled with the according to the universal waste regulations with the words, "Universal Waste Electric Lamps", "Used Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	June 30, 2010	Additionally, all Lawrence Tech personnel received a memo regarding the proper handling, labeling and management of universal waste.	\$7,463
	Mechanical Room					The used bulbs were placed in a closed, dated and labeled storage container located in the designated storage area at the Pole Barn. This storage container is labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".			

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (M)**

Environmental Regulation (i.e., CAA, RCRA, CWA,..)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Corrective Action Taken		Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Specific Regulatory Citation for Disputed Violation	Federal Citation/ State Citation			
65	A. Alfred Taubman Student Services Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Two (2) years	Fourteen (14) bulbs	40 CFR 273.13(d)(1)	R-299-9228 (4) (c) (ii)	See #64	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64
66	A. Alfred Taubman Student Services Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year.	Two (2) years	Fourteen (14) bulbs	40 CFR 273.15(c)	R-299-9228 (4)(i)(a)	See #64	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64
67	RCRA " Universal Waste	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Greater than three (3) years	Three (3) bulbs	40 CFR 273.14(c)	R-299-9228 (4)(c) (iv)	See #64	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MD)**

Environmental Regulation (i.e., CAA, RCRA, CWA,...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance:
68 RCRA - Universal Waste	Affleck House Throughout	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Three (3) bulbs	40 CFR 273.13(d)(1)  R 299.9228 (4) (e) (ii)	Used lamps must be stored in closed, structurally sound, packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
69 RCRA - Universal Waste	Affleck House Throughout	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Greater than three (3) years	Three (3) bulbs	40 CFR 273.15(e)  R 299.9228 (4)(i)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this, the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
70 RCRA - Universal Waste	Architecture Building Room A 106	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Two (2) years	Six (6) bulbs	40 CFR 273.14(e)  R 299.9228 (4)(c) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64
71 RCRA - Universal Waste	Architecture Building Room A 106	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Two (2) years	Six (6) bulbs	40 CFR 273.13(d)(1)  R 299.9228 (4) (e) (ii)	Used lamps must be stored in closed, structurally sound, packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation Federal Citation / State Citation	Corrective Action Proposed	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
72 RCRA - Universal Waste	Architecture Building Room A-106	The generator cannot demonstrate that the Universal Waste units have been accumulating on-site for no longer than one (1) year.	Two (2) years	Six (6) bulbs	40 CFR 273.15(e) 299.9228.(4)(a)	R	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must either date each individual battery within the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64		See #64
73 RCRA - Universal Waste	Art and Design Center Campus Security	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)," "Waste Battery(ies)," or "Used Battery(ies)."	Greater than three (3) years	One (1) battery	40 CFR 273.14(e) 299.9228.(4)(a)	R	Universal Waste batteries or the container in which the batteries are stored must be labeled or clearly marked with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)."	June 30, 2010	Upon generation, the Facilities and Custodial personnel have been trained to transfer all universal waste batteries to the battery collection area located in the Pole Barn. The batteries are labeled in accordance with the universal waste regulations and dated when the batteries become a waste.	See #64
74 RCRA - Universal Waste	Art and Design Center Campus Security	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	Greater than three (3) years	One (1) battery	40 CFR 273.15(e) 299.9228.(4)(a)	R	Universal Waste batteries must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must either date each individual battery on a log indicating became waste, inventory the used batteries on a log indicating the date the battery became waste, or use any other method that clearly demonstrates the accumulation start date for the battery.	June 30, 2010		See #73

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
			Quantity	Specific Regulatory Citation for Disclosed Violation			
				Federal Citation	State Citation		
75 RCRA - Universal Waste	Art and Design Center Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	Seven (7) bulbs	40 CFR 273.14(e) R-299,9228 (4)(e) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64 See #64
76 RCRA - Universal Waste	Art and Design Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamp to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Seven (7) bulbs	40 CFR 273.13(d)(1) R-299,9228 (4) (e) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64 See #64
77 RCRA - Universal Waste	Art and Design Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year.	Greater than three (3) years	Seven (7) bulbs	40 CFR 273.15(e) R-299,9228 (4)(a)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64 See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA,..)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation [Federal Citation   State Citation]	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
						Corrective Action Proposed			
RCRA - 78	Art and Design Center Room CW21	Universal waste batteries are not clearly labeled with the words "Universal Waste - Batteries," "Waste Battery(es)," or "Used Battery(es)."	Greater than three (3) years	One (1) lead acid battery	49 CFR 273.14(a) R. 239.3228(4)(a)	Universal Waste batteries or the container in which the batteries are stored must be labeled or clearly marked with any one of the following phrases: "Universal Waste - Battery(es)," or "Waste Battery(es)," or "Used Battery(es)."	See #73	See #73	See #64
RCRA - 79	Art and Design Center Room CW21	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year.	Greater than three (3) years	One (1) lead acid battery	49 CFR 273.15(c) R. 239.3228(4)(a)	Universal Waste batteries must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must either date each individual battery with the date it became waste, inventory the used batteries on a log indicating the date the battery became waste, or use any other method that clearly demonstrates the accumulation start date for the battery.	See #73	See #73	See #64
RCRA - 80	Business Services 1st Floor Storage Closet	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps," "Used Electric Lamps," or "Waste Electric Lamps."	Greater than one (1) year	Six (6) to ten (10) bulbs	40 CFR 273.14(e) R.239.3228 (4)(c)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps," "Used Electric Lamps," or "Waste Electric Lamps."	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Discharged Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
31 RCRA - Universal Waste	Business Services 1st Floor - Storage Closet	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer auditors observed used bulbs that were not in a closed container.	Greater than one Six (6) to ten (10) years	Six (6) to ten (10) bulbs	40 CFR 273.13(d)(1) (e)(ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
32 RCRA - Universal Waste	Business Services 1st Floor - Storage Closet	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Greater than one Six (6) to ten (10) years	Six (6) to ten (10) bulbs	40 CFR 273.15(e) (h)(i)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
33 RCRA - Universal Waste	Business Services Room 31	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than one (1) year	One (1) bulb	40 CFR 273.14(e) (e)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation File, CAA, RCRA, CWA, ...	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation:	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation / State Citation				
84 RCR.A - Universal Waste	Business Services Room J31	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than one (1) year	One (1) bulb	40 CFR 273.15(g)(1)	R 299.9228 (4) (c) (ii)	See #64	See #64	See #64
85 RCR.A - Universal Waste	Business Services Room J31	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Greater than one (1) year	One (1) bulb	40 CFR 273.15(g)	R 299.9228 (4)(v)	See #64	See #64	See #64
86 RCR.A - Universal Waste	Campus-Wide	Personnel who handle or have the responsibility for managing universal wastes have not been informed of the proper handling and emergency procedures appropriate to the universal wastes generated on-site.	Greater than three (3) years	N/A	40 CFR 273.16	R 299.9228(4)(e)	See #64	See #64	\$150

Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)

Environmental Regulation 6(e, CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Corrective Action Taken		Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Specific Regulatory Citation for Disclosed Violation	Federal Citation State Citation			
87 RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	Two (2) bulbs	40 CFR 273.14(e) (4)(e) (iv)	R-299-9228 words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64
88 RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Two (2) bulbs	40 CFR 273.13(d)(1) (c) (ii)	R-299-9228 (4) packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
89 RCRA - Universal Waste	Engineering Building 1st Floor - Custodial Closet	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year.	Greater than three (3) years	Two (2) bulbs	40 CFR 273.15(e) (4)(a)	R-299-9228 Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
Regulation (i.e., CAA, RCRA, CWA...)	Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Federal Citation	State Citation			
90 RCRA - Universal Waste	Engineering Building	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)."	Greater than three (3) years	Three (3) batteries	R299.9228 (4)(a)	40 CFR 273.14(a)	See #73	See #73	See #64
91 RCRA - Universal Waste	Engineering Building	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	Greater than three (3) years	Three (3) batteries	R299.9228 (4)(a)	40 CFR 273.15(c)	See #73	See #73	See #64
92 RCRA - Universal Waste	Engineering Building	Universal waste batteries are not clearly labeled with the words "Universal Waste - Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies)."	Greater than three (3) years	One (1) battery	R299.9228 (4)(a)	40 CFR 273.14(a)	See #73	See #73	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MD)**

Environmental Regulation (i.e., CAA, RCRA, CWA,...)	Location - Building Name and Room Issue of Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation Federal Citation State Citation	Corrective Action Taken	Date Completed Steps Taken to Prevent Recurrence Cost of Compliance
93 RCRA - Universal Waste	Engineering Building Metal Fabrication Laboratory	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	Greater than three (3) years	One (1) battery 40 CFR 273.15(e) R. 299.9228.(4)(i)	Universal Waste batteries must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must either date each individual battery with the date it became waste, inventory the used batteries on a log indicating the date the battery became waste, or use any other method that clearly demonstrates its accumulation start date for the battery.	See #73 See #73 See #64
94 RCRA - Universal Waste	Field House Room R6	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Greater than three (3) years	Four (4) bulbs 40 CFR 273.14(e) R. 299.9228.(4)(e)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64 See #64 See #64
95 RCRA - Universal Waste	Field House Room R6	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Four (4) bulbs 40 CFR 273.13(d)(1) R. 299.9228.(4)(e)(ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64 See #64 See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Licensing Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation Federal Citation, State Citation:	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
96 RCRA - Universal Waste	Field House Room R6	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	Greater than three (3) years	Four (4) bulbs	40 CFR 273.15(c)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the first used bulb is placed within the container, or use any other means that clearly identifies the generation in that date.	See #64	See #64	See #64
97 RCRA - Universal Waste	Pole Barn Interior	Universal waste batteries are not clearly labeled with the words "Universal Waste - Batteries," "Waste Battery(es)," or "Used Battery(es)."	Greater than three (3) years	Two (2) batteries	40 CFR 273.14(a)	Universal Waste batteries or the container in which the batteries are stored must be labeled or clearly marked with any one of the following phrases: "Universal Waste - Batteries," or "Waste Battery(es)," or "Used Battery(es)."	See #73	See #73	See #64
98 RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste batteries have been accumulating on-site for no longer than one (1) year	Greater than three (3) years	Two (2) batteries	40 CFR 273.15(c)	Universal Waste batteries must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must either date each individual battery with the date it became waste, inventory the used batteries on a log indicating the date the battery became waste, or use any other method that clearly demonstrates the accumulation start date for the battery.	See #73	See #73	See #64
99 RCRA - Universal Waste	Pole Barn Interior	Leaking and/or damaged used lamps are not being cleaned up and broken contact placed in containers that are closed and structurally sound.	Greater than three (3) years	One (1) used, broken bulb on ground	40 CFR 273.13(d)(2)	Broken bulbs must be cleaned up immediately and placed in a container that is closed, structurally sound, compatible with the contents of the lamp and in good condition. It is recommended that when cleaning a damaged or leaking bulb to clean the area using a damp cloth or ditch tape, not to sweep the area or to use a shop vacuum, as to prevent the spread of the hazardous components of the bulb. The container must also be clearly labeled and dated to ensure disposal within one (1) year.	R 299.9228 (4) (c) (ii)	The broken bulb has been properly cleaned up and placed in a closed, structurally sound container located in the Pole Barn.	The Director of Campus Safety is responsible for ensuring that the Facilities and Custodial personnel are trained and complying with the proper universal waste procedures. To ensure that universal waste (i.e. lamps and batteries) are not stored on campus for greater than one year, LTU will schedule at minimum an annual pickup for universal waste. This universal waste will be disposed of through an licensed contractor. Additionally, all Lawrence Tech personnel received training regarding the proper handling, labeling and management of universal waste.

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g. CAA, RCRA, CWA, ...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Corrective Action Proposed		Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
				Quantity	Specific Regulatory Citation for Discharged Violation			
				Federal Citation	State Citation			
RCRA - 100 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	One (1) used, broken bulb on ground.	40 CFR 273.14(c) R-299-9228 (2)(c)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64 See #64	See #64 See #64
RCRA - 101 Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Per Audits observed used bulbs that were not in a closed container.	Greater than three (3) years	One (1) used, broken bulb on ground.	40 CFR 273.13(d)(1) R-299-9228 (4)(c)(ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64 See #64	See #64 See #64
RCRA - 102 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year.	Greater than three (3) years	One (1) used, broken bulb on ground.	40 CFR 273.15(c) R-299-9228 (4)(f)(a)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64 See #64	See #64 See #64
RCRA - 103 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	Trash can of broken bulbs	40 CFR 273.14(c) R-299-9228 (4)(c)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64 See #64	See #64 See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disfavored Violation	Corrective Action Proposed	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - 104 Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Trash can of broken bulbs	40 CFR 273.13(d)(1)	R-299-9228 (4) (c) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
RCRA - 105 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year.	Greater than three (3) years	Trash can of broken bulbs	40 CFR 273.15(c)	R-299-9228 (4)(e)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
RCRA - 106 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	60-65 sealed boxes of approximately fifteen (15) to twenty (20) bulbs in each box	40 CFR 273.14(e)	R-299-9228 (4)(c) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Distinct Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - 107 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Greater than three (3) years	60-65 sealed boxes of approximately fifteen (15) to twenty (20) bulbs in each box.	40 CFR 273.15(e) (4)(e)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
RCRA - 108 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	25-30 unsealed boxes of approximately fifteen (15) to twenty (20) bulbs in each box	40 CFR 273.14(e) (4)(g) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64
RCRA - 109 Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	25-30 unsealed boxes of approximately fifteen (15) to twenty (20) bulbs in each box	40 CFR 273.13(d)(1) (4)(c) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disposed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
Federal Clinton	State Clinton								
RCRA - 110 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the universal waste bulbs have been accumulating on-site for no longer than one (1) year.	Greater than three (3) years	25-30 unsealed boxes of approximately fifteen (15) to twenty (20) bulbs in each box	40 CFR 273.15(c)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must state the box with the date that the first used bulb is placed within the container; or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
111 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	Approximately 20-25 loose fluorescent bulbs	40 CFR 273.14(e)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64
RCRA - 112 Universal Waste	Pole Barn Interior	Used lamps are not maintained in a way that prevents the release of any hazardous components for the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Approximately 20-25 loose fluorescent bulbs	40 CFR 273.15(d)(1)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation Location, Building Name (i.e., CAA, RCRA, CWA,...)	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation; Quantity	Corrective Action Taken		Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
			Specific Regulatory Citation for Delayed Violation	Federal Citation State Citation			
RCRA - 113 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	Approximately 20-25 lens fluorescent bulbs	40 CFR 273.15(c) (4)(e)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this, the generator must date the box, with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64 See #64
RCRA - 114 Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than three (3) years	Approximately three (3) to four (4) mercury lamps	40 CFR 273.14(e) (4)(e) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64 See #64 See #64
RCRA - 115 Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than three (3) years	Approximately three (3) to four (4) mercury lamps	40 CFR 273.13(d)(1) (4)(e) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64 See #64 See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e.,CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Quantity	Duration of Violation	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation State Citation				
1.16 RCRA - Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Approximately three (3) to four (4) mercury lamps	Greater than three (3) years	R 299.9228 (4)(a) 40 CFR 273.15(c)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
1.17 RCRA - Universal Waste	Pole Barn Interior	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Approximately ten (10) metal halide lamps	Greater than three (3) years	40 CFR 273.14(c) R 299.9228 (4)(g) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64
1.18 RCRA - Universal Waste	Pole Barn Interior	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Approximately ten (10) metal halide lamps	Greater than three (3) years	40 CFR 273.13(d)(1) R 299.9228 (4) (5)(ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent leakage and compatible with the components of the used bulbs.	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MD)**

Environmental Regulation Location - Building Name and Room (i.e., CAA, RCRA, CWA, etc.)	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Direct Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - 119 Universal Waste	Pole Barn Interior	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Greater than three (3) years	40 CFR 273.15(e)	R-293.9228 (4)(i)	See #64 See #64	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64
RCRA - 120 Universal Waste	Professional Development Center Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Twenty-five (25) bulbs	40 CFR 273.14(e)	R-293.9228 (4)(e)(iv)	See #64 See #64	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64
RCRA - 121 Universal Waste	Professional Development Center Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamp to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Twenty-five (25) bulbs	40 CFR 273.13(d)(1)	R-293.9228 (4) (e)(ii)	See #64 See #64	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (M1)**

Environmental Regulation (ie CAA, RCRA, CWA, etc.)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation?	Quantity	Specific Regulatory Citation for Dislocated Violation Federal Citation State Citation	Corrective Action Proposed	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA - Universal Waste	122 Professional Development Center Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year	Two (2) years	Twenty-five (25) bulbs	R 209.9228 (4)(g)	49 CFR 273.15(c)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
RCRA - Universal Waste	Science Building 1st Floor - Hallway	Leaking and/or damaged used lamps are not being cleaned up and broken contents placed in containers that are closed and structurally sound.	Greater than one (1) year	One (1) bulb	R 209.9228 (4)(c) (iii)	40 CFR 273.13(d)(2)	Broken bulbs must be cleaned up immediately and placed in a container that is closed, structurally sound, compatible with the contents of the lamp and in good condition. It is recommended that when cleaning a damaged or leaking bulb to clean the area using a damp cloth or due tape, not to sweep the area or to use a shop vac, as to prevent the spread of the hazardous components of the bulb. The container must also be clearly labeled and dated to ensure disposal within one (1) year.	See #64	The Director of Campus Safety is responsible for ensuring that facilities and Custodial personnel are trained and complying with the proper universal waste procedures. To ensure that universal waste (i.e. lamps and batteries) are not stored on campus for greater than one year, LTU will schedule at a minimum an annual pickup for universal waste. The universal waste will be disposed of through an licensed contractor.	See #64
RCRA - Universal Waste	Science Building 1st Floor - Hallway	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Greater than one (1) year	One (1) bulb	R 209.9228 (4)(c) (iv)	40 CFR 273.14(e)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation 6-1, CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Discussed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
125 RCRA - Universal Waste	Science Building 1st Floor - Hallway	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps in the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than one (1) year	One (1) bulb	40 CFR 273.13(d)(1) (e) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
126 RCRA - Universal Waste	Science Building 1st Floor - Hallway	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on-site for no longer than one (1) year	Greater than one (1) year	One (1) bulb	40 CFR 273.15(e) (f) (a)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
127 RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Two (2) years	Two (2) bulbs	40 CFR 273.14(e) (f) (c) (iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
Federal Citation	State Citation								
128 RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Two (2) years	Two (2) bulbs	40 CFR 273.13(d)(1)	R 299.9228 (4) (e)(ii)	See #64	See #64	See #64
129 RCRA - Universal Waste	Science Building 1st Floor - Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year.	Two (2) years	Two (2) bulbs	40 CFR 273.15(e)	R 299.9228 (4)(i)	See #64	See #64	See #64
130 RCRA - Universal Waste	Science Building Basement	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Two (2) years	Seven (7) bulbs	40 CFR 273.14(e)	R 299.9228 (4)(e)(iv)	See #64	See #64	See #64

Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Proposed	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
131 RCRA - Universal Waste	Science Building Basement	Used lamps are not maintained in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Two (2) years	Seven (7) bulbs	40 CFR 273.15(g)(1) (c), (d)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
132 RCRA - Universal Waste	Science Building Basement	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for no longer than one (1) year.	Two (2) years	Seven (7) bulbs	40 CFR 273.15(c) (d)(g)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container; or use any other means that clearly identifies this generation start date.	See #64	See #64	See #64
133 RCRA - Universal Waste	University North Housing 3rd Floor - Mechanical Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	Greater than one (1) year	One (1) bulb	40 CFR 273.14(g) (d)(g)(iv)	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64	See #64	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violation Federal Citation / State Citation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence See #64	Cost of Compliance See #64
RCRRA - 134 Universal Waste	University North Housing 3rd Floor - Mechanical Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than one (1) year	One (1) bulb	40 CFR 273.13(d)(1)	R-299.9228 (4) (c) (ii)	See #64	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64
RCRRA - 135 Universal Waste	University North Housing 3rd Floor - Mechanical Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating on site for longer than one (1) year	Greater than one (1) year	One (1) bulb	40 CFR 273.15(e)	R-299.9228 (4)(j)	See #64	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container, or use any other means that clearly identifies the generation start date.	See #64
RCRRA - 136 Universal Waste	University South Housing Room 108 - Maintenance Room	Containers in which used lamps are stored are not labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps"	Greater than one (1) year	Approximately ten (10) bulbs	40 CFR 273.14(e)	R-299.9228 (4)(g) (iv)	See #64	Used lamps must be stored in containers that are labeled with the words "Universal Waste Electric Lamps", "Used Electric Lamps", or "Waste Electric Lamps".	See #64

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
					Federal Citation State Citation				
RCRA-A 137 Universal Waste	University South Housing Room 108 - Maintenance Room	Used lamps are not managed in a way that prevents the release of any hazardous components of the lamps to the environment. Peer Auditors observed used bulbs that were not in a closed container.	Greater than one (1) year	Approximately ten (10) bulbs	40 CFR 273.13(e)(1) (c) (ii)	Used lamps must be stored in closed, structurally sound packaging that is adequate to prevent breakage and compatible with the components of the used bulbs.	See #64	See #64	See #64
RCRA-A 138 Universal Waste	University South Housing Room 108 - Maintenance Room	The generator cannot demonstrate that the Universal Waste bulbs have been accumulating one (1) year for no longer than one (1) year.	Greater than one (1) year	Approximately ten (10) bulbs	40 CFR 273.15(c)	Universal Waste bulbs must be disposed of within one (1) year from the date of generation. To demonstrate this the generator must date the box with the date that the first used bulb is placed within the container; or use any other means that clearly identifies the generation start date.	See #64	See #64	See #64
RCRA-Used Oil Management 139	Applied Research Center Lab Space	Peer auditors observed one (1) improperly labeled 1-gallon container of used oil.	One (1) year	Approximately 1 gallon container	40 CFR 279.22 (4)(a)	The one (1) gallon container storing used oil should be labeled with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the container.	\$11
RCRA-Used Oil Management 140	Applied Research Center Near Point Booth	Peer auditors observed two improperly labeled 55-gallon drums of used oil.	Greater than three (3) years	Two (2)-55 gallon drums	40 CFR 279.22 (4)	The two (2)-55 gallon drums storing used oil should be labeled with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the container.	\$11
RCRA-Used Oil Management 141	Applied Research Center Outside Flammable Cabinet #1	Peer auditors observed one (1) improperly labeled 55-gallon drum of used oil.	Greater than three (3) years	One (1)-55 gallon drum	40 CFR 279.22 (3)	The one (1)-55 gallon drum storing used oil should be labeled with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the container.	\$11
RCRA-Used Oil Management 142	Engineering Building Engineering Loading Dock	Peer auditors observed four (4) improperly labeled 5-gallon containers of used oil.	Greater than three (3) years	Four (4)-5 gallon containers	40 CFR 279.22 (3)	The two (2)-5 gallon container storing used oil should be labeled with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the container.	\$11

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., GAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noticed in Environmental Compliance Audit	Quantity	Duration of Violation	Specific Regulatory Citation for Disclosed Violation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
RCRA-Used Oil Management	Engineering Building Room E2 - Geo Materials Laboratory	Peer auditors observed one (1)-1000 ml beaker improperly labeled and uncovered container of used oil.	One (1)-1000 ml beaker	Greater than three (3) years	40 CFR 279.22; R 299.9810 (3)	The one (1)-1000 ml beaker container storing used oil should be in a closed container and labeled with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
RCRA-Used Oil Management	Maintenance Building - Automotive Shop	Peer auditors observed two (2) improperly labeled 5-gallon container of used oil.	Two (2)-5 gallon containers	One (1) year	40 CFR 279.22; R 299.9810 (3)	The two (2)-5 gallon container storing used oil should be labeled A label with the words "Used Oil" was marked on the container.	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
RCRA-Used Oil Management	Science Building Room 201	Peer auditors observed one (1) improperly labeled 1-gallon crated oil.	One (1)-1 gallon scatiner	One (1) year	40 CFR 279.22; R 299.9810 (3)	The one (1) gallon container storing used oil should be labeled A label with the words "Used Oil" was marked on the container.	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
RCRA-Used Oil Management	Science Building Room 219	Peer auditors observed two (2) improperly labeled 24 oz containers of used oil.	Two (2)-24 oz containers	One (1) year	40 CFR 279.22; R 299.9810 (3)	The two (2)-24 oz containers storing used oil should be labeled A label with the words "Used Oil" was marked on the container.	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
RCRA-Used Oil Management	Science Building Room 203	Peer auditors observed one (1) improperly labeled 1-gallon container of used oil.	One (1)-1 gallon container	One (1) year	40 CFR 279.22; R 299.9810 (3)	The one (1) gallon container storing used oil should be labeled A label with the words "Used Oil" was marked on the container.	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
RCRA-Used Oil Management	Wayne H. Buell Management Building Penthouse - Elevator Room	Peer auditors observed one (1) improperly labeled 1-quart container of used oil.	One (1)-1 quart container	One (1) year	40 CFR 279.22; R 299.9810 (3)	The one (1)-1 qt container storing used oil should be stored in a closed and labeled container with the words "Used Oil".	August 13, 2010	LTU personnel handling used oil have been informed and trained on the proper handling of used oil containers.	\$11
TOSCA - LAP	University South Housing	Failure to provide purchaser or lessee any records or reports available to the seller or lessor pertaining to lead-based paint and/or lead-based paint hazards in the target housing	N/A		N/A - No equivalent state to lead-based paint and/or lead-based paint regulation	The University provided the lessors with information pertaining to lead-based paint and any hazards.	June 30, 2010	The housing contract has been revised to include information pertaining to lead-based paint and any hazards. As new students go through the registration process, any students or staff occupying target housing will be provided with the lead based paint information. All documentation is kept on file in the Department of Campus Safety's office.	\$245
TOSCA - LAP	University South Housing	Failure to retain a copy of the completed disclosure records for no less than three years from the commencement date of the lease or its completion	N/A		N/A - No equivalent state to lead-based paint and/or lead-based paint regulation	Copies of the disclosure records are now being retained (for no less than three years) in the Department of Campus Safety's office.	June 30, 2010	The housing contract has been revised to include information pertaining to lead-based paint and any hazards. As new students go through the registration process, any students or staff occupying target housing will be provided with the lead based paint information. All documentation is kept on file in the Department of Campus Safety's office.	See #149
TOSCA - LAP	University South Housing								

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (e.g., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Raised in Environmental Compliance Audit	Duration of Violation <sup>1</sup>	Quantity	Specific Regulatory Citation for Dislosed Violation	Corrective Action Prepared	Date Completed	Steps Taken to Prevent Recurrence	Cert. of Compliance
Federal Citation	State Citation								
151 TSCA - LBP	University South Housing	Failure to provide purchaser or lessee EPA-approved lead hazard information/pamphlet	N/A	N/A (2) units	40 CFR § 745.107(h)(1)	N/A - No equivalent state regulation	June 30, 2010	The University provided the lessors of target housing with EPA approved lead hazard communication pamphlet "Project Four Family Home Lead in Your Home", EPA#747-KS-94-01.	See #149
152 TSCA - LBP	University South Housing	Failure to disclose to purchaser or lessee the presence of any known lead-based paint and/or lead-based paint hazards in the target housing	N/A	None (2) units	40 CFR § 745.107(h)(2)	N/A - No equivalent state regulation	June 30, 2010	The University provided a disclosure regarding the potential of lead-based paint in the target housing of lessees.	See #149
153 TSCA - LBP	University South Housing	Failure to include, as an attachment or within the contract to lease target housing, the Lead Warning Statement	N/A	N/A (2) units	40 CFR § 745.113(b)(1)	N/A - No equivalent state regulation	June 30, 2010	The University amended the leasing contract to include the Lead Warning Statement. All current leases have been given the amended contract.	See #149
154 TSCA - LBP	University South Housing	Failure to include, as an attachment or within the contract to lease target housing, a statement by the lessor disclosing the presence of known lead-based paint and/or lead-based paint hazards or indicating no knowledge of the presence of lead-based paint and/or lead-based paint hazards	N/A	None (2) units	40 CFR § 745.113(b)(2)	N/A - No equivalent state regulation	June 30, 2010	The contract has been amended to include an attachment for the occupant to sign to verify that they received the lead-based paint disclosure information. All current leases have been given the amended contract.	See #149

**Final Schedule A - Disclosure of Environmental Compliance Violations at Lawrence Technological University (MI)**

Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Specific Regulatory Citation for Disclosed Violations	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
Environmental Regulation (i.e., CAA, RCRA, CWA...)	Location - Building Name and Room	Issue or Concern Noted in Environmental Compliance Audit	Duration of Violation	Quantity	Federal Citation	Corrective Action Taken	Date Completed	Steps Taken to Prevent Recurrence	Cost of Compliance
155 TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, a list of any records or reports available to the lessor that pertain to the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or to indicate that no such records are available pursuant to 40 CFR § 745.113(b)(3)	N/A	Nine (9) units	40 CFR § 745.113(b)(3) N/A - No equivalent state regulation	Include as an attachment or within a contract to lease target housing, a list of any records or reports available to the lessor that pertain to the presence of any known lead-based paint and/or lead-based paint hazards in the target housing or to indicate that no such records are available pursuant to 40 CFR § 745.113(b)(3)	The amended contract now includes a section stating that the University has no such records or reports pertaining to lead-based paint in target housing. All current tenants have been given the amended contract.	June 30, 2010	The housing contract has been revised to include information pertaining to lead-based paint and any hazards. As new students go through the registration process, any students or staff occupying target housing will be provided with the lead based paint information. All documentation is kept on file in the Department of Campus Safety's office.
156 TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, a statement by the lessee affirming receipt of the information required by 40 CFR §§ 745.113(b)(2) and (b)(3) and the lead hazard pamphlet required under 15 USC § 2686 as specified in 40 CFR § 745.113(b)(4)	N/A	Nine (9) units	40 CFR § 745.113(b)(4) N/A - No equivalent state regulation	Include as an attachment or within a contract to lease target housing, a statement affirming the receipt of the information required by 40 CFR §§ 745.113(b)(2) and (b)(3) and the lead hazard pamphlet required under 15 USC § 2686 as specified in 40 CFR § 745.113(b)(4)	The amended contract now includes a statement for the lessee to sign to verify that they received the lead-based paint disclosure information. All current tenants have been given the amended contract.	June 30, 2010	The housing contract has been revised to include information pertaining to lead-based paint and any hazards. As new students go through the registration process, any students or staff occupying target housing will be provided with the lead based paint information. All documentation is kept on file in the Department of Campus Safety's office.
157 TSCA - LBP	University South Housing	Failure to include, as an attachment or within a contract to lease target housing, the signatures of the lessors, agents and lessees certifying to the accuracy of their statements, as well as dates of said signatures, pursuant to 40 CFR § 745.113(b)(6)	N/A	Nine (9) units	40 CFR § 745.113(b)(6) N/A - No equivalent state regulation	Include, as an attachment or within a contract to lease target housing, the signatures of the lessors, agents and lessees certifying to the accuracy of their statements, as well as dates of said signatures, pursuant to 40 CFR § 745.113(b)(6)	To the University amended contract includes a section for the occupant and University to certify the accuracy of the statement by signing. All current tenants have been given the amended contract.	June 30, 2010	The housing contract has been revised to include information pertaining to lead-based paint and any hazards. As new students go through the registration process, any students or staff occupying target housing will be provided with the lead based paint information. All documentation is kept on file in the Department of Campus Safety's office.

(1) The duration of non-compliance is based on the records reviewed, and the knowledge of the college personnel most familiar with environmental compliance within the departments and programs audited.